

SMITH | VILLAZOR

Smith Villazor LLP
250 West 55th Street, 30th Floor
New York, NY 10019
www.smithvillazor.com

RODNEY VILLAZOR
T 212 582 4400
D 212 377 0852
rodney.villazor@smithvillazor.com

August 26, 2022

VIA ECF

Honorable Michael A. Hammer
United States District Court for the
District of New Jersey
Martin Luther King Courthouse
50 Walnut Street Room 2C
Newark, NJ 07101

Re: *United States v. Matthew Goetsche, et al., 19-CR-877 (CCC)*
Proposed Modification of Pretrial Release Order

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goetsche. We respectfully move to modify his bail conditions to allow Mr. Goetsche to visit a family relative at her home in Lakewood, Colorado who is in hospice care, with a third-party custodian. Each visit would be pre-approved by Pretrial.

The Court's Order Setting Conditions of Release (dkt. 171) requires Mr. Goetsche remain at his residence under home incarceration and that he "shall remain in the presence of a third-party custodian at all times unless otherwise approved by Pretrial Services." The Court previously approved other proposed consent bail modifications to these conditions (dkts 187, 193, 225, 229, and 251).

Pretrial Services has no objection to this proposed request. The government, through AUSA, Anthony Torntore defers to Pretrial Services. Thank you in advance.

Respectfully submitted,

/s/

Rodney Villazor, Esq.
SMITH VILLAZOR LLP

Hon. Michael A. Hammer

August 26, 2022

Page Two

cc: Andrew Lourie, Esq.
Benjamin Sauter, Esq.
Amanda Tuminelli, Esq.
Government counsel of record (via ECF and e-mail)
U.S. Pretrial Services Officer David Hernandez (via e-mail)
U.S. Pretrial Services Officer Troy Ruplinger (via e-mail)